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Federal Communications Commission

OFFICE OF THE SECRETARY

In the Matter of

Billed Party Preference
for 0+ InterLATA Calls

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CC Docket No. 92-77

ORIGINAL
FILE

COMMENTS OF
AIRPORTS ASSOCIATION COUNCIL INTERNATIONAL - NA

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TABLE OF CONTENTS

	<u>Page</u>
Summary of Argument.....	ii
AACI-NA's Members Have a Vital Interest in this Proceeding on Behalf of the Travelling Public.....	1
Billed Party Preference Cannot be Implemented Until There is Unqualified Assurance that the Public Will Actually Benefit from this Service.....	5
1) Service Quality.....	5
2) Cost.....	7
3) Service Enhancements.....	8
Billed Party Preference Should Not Be Implemented Until It Is Integrated Within a Regulatory Structure That Assures Fair and Reasonable Compensation To All Premises Owners.....	11
1) To the Extent that Billed Party Preference Denies Premises Owners the Opportunity to Recover Their Costs, the Availability and Convenience of Payphone Service May Decline.....	11
2) The Regulatory Impediments to a System of Fair Compensation to Premises Owners Must Be Addressed in this Docket.....	13
a) The Scope of the Compensation Mechanism.....	14
b) Level of Compensation.....	16
Conclusion.....	19

Summary of Position

On behalf of its United States members, the Airports Association Council International-NA opposes implementation of billed party preference unless and until (i) there is incontrovertible proof that the public will affirmatively benefit from this alteration in the method of delivering payphone service and (ii) a regulatory system is put in place that provides airports and other premises owners with fair and adequate compensation for the central part that they play in the provision of public telephone service.

On its face, billed party preference appears to carry a price which entails degradation in quality of service, increased costs to users of public payphones, and curtailment of service enhancements and flexibility. Because the present system of delivering payphone service to the public works reasonably well, fundamental alterations should not be made absent unequivocal proof that the public -- and the travelling public in particular -- will unqualifiedly benefit from billed party preference.

Unless billed party preference is integrated into a regulatory framework that assures adequate cost recovery for premises owners, its implementation may have the unintended effect of degrading the availability and accessibility of payphone service to the public. The governmental authorities which own airports are required by law and economic policy to take steps to make airports as self-sustaining as possible. To the extent that billed party preference

denies airports the opportunity to recover the costs -- including opportunity costs -- of payphone provisioning, airports may have no alternative other than to curtail the quantity and quality of payphone services offered at these facilities, to the detriment of the public. The existing regulatory structure does not assure airports and other premises owners with fair compensation for the central part they play in the provisioning of payphone service. The regulating mechanism is incomplete because it provides compensation only in the case of privately supplied payphones. It is also inadequate because the monthly fee structure upon which it is based fails to properly reflect the actual level of usage of payphones of major facilities, such as airports.

If billed party preference is not to have adverse consequences upon the availability of payphone service at public facilities, compensation to premises owners must be assured for all payphones and must be based upon an accurate and fair measure of cost and value. Accordingly, this proceeding should be enlarged to encompass these basic questions regarding the scope and level of payphone compensation available to airports and premises owners. The Commission should refrain from authorizing implementation of this new service until these issues are resolved.

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CC Docket No. 92-77

COMMENTS OF
AIRPORTS ASSOCIATION COUNCIL INTERNATIONAL - NA

On behalf of its United States members, the Airports Association Council International - North America ("AACI-NA") opposes implementation of billed party preference unless and until (i) there is uncontrovertible proof that the public will suffer no harm from this alteration in the method of delivering payphone service and (ii) a regulatory system is put in place that provides premises owners with fair and adequate compensation for the central part that they play in the provisioning of public telephone service. In support, the following is stated:

AACI-NA's Members Have a Vital Interest
in this Proceeding on Behalf of the
Travelling Public.

AACI-NA represents the local, regional and state governing bodies that own and operate the principal airports served by scheduled air carriers in the United States.^{1/} The U.S. airport members of AACI-NA enplane more than 90 percent of the total

^{1/} A list of our members is appended.

domestic and virtually all international scheduled airline passenger and cargo traffic in the United States.

As public proprietors of transportation facilities, airport operators provide a broad range of services to passengers, shippers, airlines, businesses and government agencies engaged in air transportation activities. One of the major services made available to the travelling public is the public payphone. Indeed, airports are one of the largest groups of providers of public payphone service in this country. Based upon surveys conducted by our organization in 1987 and 1992, we estimate that there are in excess of 30,000 payphones located at airports in the United States at the present time; this is an increase of more than 5 percent since 1987.

These payphones experience extremely heavy usage, a substantial percentage of which is interstate InterLATA traffic. We estimate that the average airport payphone is used to place more than 100 long distance calls per month. Usage is greatest at payphones located in gate and common/ticket areas where the greatest number of payphones in airports are located. AACI-NA thus has a vital stake in this proceeding as a spokesman for the more than 480 million passengers that pass through its members' airports annually and use the payphones at those facilities.

Airports and other premises owners play a crucial role in the provisioning of payphone service. The United States District Court of the District of Columbia ("MFJ Court") has pointed out that

[T]he premises owner decides whether to have public telephones at all (and how many), what type the telephone should be, what kinds of services they should offer, where they should be installed and ... when they may be used, and when they should be removed. In short, the owner has ultimate control over the public telephones on his premises and a closer relationship with these telephones than anyone else.

U.S. v. Western Electric, 698 F.Supp. 348, 364-65 (D.C. Cir. 1988) (footnote omitted).

In determining the priority of use of limited airport facilities, airport operators must consider a variety of factors. Key among these is the cost of providing the premises and support systems for services to the public. The cost of payphone provisioning -- like costs associated with all other non-governmental services -- is recovered through financial arrangements that are based on the "user pays" approach. Airport operators are required to follow this approach to be eligible for the federal grants received for certain capital projects. A condition for the acceptance of such grants is that assurance be given by the airport operator to the Secretary of Transportation that the airport "will maintain a fee and rental structure for facilities and services being provided to the airport users which will make the airport as self-sustaining as possible" Airport Development Assurance No. 28, Appendix D to 14 C.F.R. Part 152.

Businesses benefitting from the airport market, created by the multi-billion dollar outlays made by public airport operators, must therefore pay reasonable compensation for the privilege of access to that market. This is true even in situations in which the

business is not physically located on the airport. See, e.g., Alamo Rent-A-Car, Inc. v. Sarasota Manatee Airport Authority, 825 F.2d 367 (11th Cir. 1987), cert. denied, 108 S.Ct. 1022, later app., 906 F.2d 516 (11th Cir. 1990), cert. denied, 111 S.Ct. 1073. In the case of payphones, compensation is typically based on a percentage of, or is related to, the gross revenues generated by the telephone companies that benefit from the provisioning of service by the airport or its agent.

Absent arrangements that assure a continuation of reasonable compensation to the airports or their agents (and thereby indirectly to airports), the provisioning of public payphone service would be severely disrupted. The governmental authorities which own airports, in the exercise of their "ultimate control" over public telephones on the airport premises, would have to consider reducing the number of payphones and the kinds of payphone services that are offered, thereby recapturing, from other revenue-producing businesses, the funds needed to maintain airport self-sufficiency. Otherwise, the airport would be put in the untenable position of requiring users of other airport-provided services to subsidize the provisioning of payphones.

Thus, the direct interests of payphone users cannot be disassociated from the interests of airport operators, as premises owners. If billed party preference degrades quality of service, results in increased costs to end users of public payphones, and restricts service enhancements and flexibility, the supposed

convenience of ubiquitous 0+ dialing will not help, but will rather harm, the travelling public. At the same time, unless billed party preference is integrated into a system that assures premises owners fair and adequate compensation for the central part that they play in the provisioning of this service, the availability and quality of service will diminish, to the ultimate detriment of the public.

Accordingly, the Commission's assessment of the public interest values of billed party preference must take account of both the direct and indirect consequences of this alteration in the method of delivering payphone service to the public.

Billed Party Preference
Cannot be Implemented Until There is
Unqualified Assurance that the Public
Will Actually Benefit from this Service.

There are at least three fundamental issues which must be resolved before it can be determined whether the "convenience" in being able to place operator service calls without using an access code yields unqualified benefits to the American public:

1) Service Quality. As the Notice of Proposed Rulemaking (NPRM) points out, there are two technological problems related to the deployment of billed party preference that may result in substantially increased consumer frustration. The first is whether billed party preference would require callers to provide certain information about their call (e.g., the calling card number) twice. The second relates to the potential for an increase, of up to four seconds per call, in access time for operator services calls. In both cases, it is asserted that the problem will be resolved

through the deployment of common channel signaling (SS7). NPRM at ¶¶ 26, 27.

We urge the Commission to be extremely skeptical in evaluating this solution. Experience in other contexts teaches that SS7 is not being deployed uniformly throughout the country, that deployment of SS7 itself carries a very substantial cost and that, in the end, SS7 may not have all of the capabilities that are claimed for it. See, Provision of Access for 800 Service, 6 F.C.C. Rcd. 5421 (1991). Further, experience demonstrates that, once the Commission has committed itself to a policy directive based upon SS7, it has virtually no choice but to continue in that direction whatever the impact upon service quality. Id.

The prospect that implementation of billed party preference may degrade the quality of service available through payphones is of great concern to airport operators. In the context of a home phone, a four-second increase in access time might be regarded as tolerable. In the context of a business traveller trying to place a call before catching or immediately after deplaning from a flight, such a delay is certain to yield increased consumer frustration.^{2/} The need to provide the same information twice in order to complete a single call is likely to be viewed by most travellers as extremely inconvenient.

^{2/} The fact that the consumer may be receiving instructions from the local exchange carrier during that additional call setup period is irrelevant: it is the elapsed time to set up the call that is significant.

Even the most sophisticated traveller may not understand that these difficulties are not the fault of the airport. It is our experience that complaints about the quality of telephone service from payphones at airports are not universally directed to the telephone company that has caused the problem; they are often addressed to the airport itself. In any case, unless these problems are fully and completely solved, consumers will not believe -- and are entitled to disbelieve -- that billed party preference actually makes payphone service "more user friendly." NPRM at ¶ 16.

2) Cost. The Commission is quite correct that the cost of implementing and operating billed party preference and how those costs "are likely to affect operator services rates paid by consumers" (NPRM at ¶ 25) must be taken into account in assessing the overall public benefit of this service. As premises owners, we are not in a position to provide a detailed explanation of the costs of implementation and operation of billed party preference. We do find the estimates that have been put forth in the record to-date alarming: it appears that implementation of billed party preference for payphone service alone would cost a minimum of \$150 million for the 7 RBOCs and GTE; and those estimates do not appear to include the annual cost of operation of the system.

Moreover, absolute cost is not the controlling factor. As the NPRM suggests, absolute cost will vary depending upon the scope of the system mandated. It would cost less, in the absolute sense,

to implement billed party preference for InterLATA payphone traffic alone than it would to implement the service for all InterLATA 0+ and 0- traffic from any phone. But, in terms of impact upon the end user, the relevant issue is the relationship of the cost of implementation and operation of billed party preference to the specific revenue base available to support that service. The cost of billed party preference will ultimately be absorbed by those telephone consumers to whom the service is made available; and it will be borne by that segment of the population whether they actually make use of billed party preference or not.^{3/}

The Bell Atlantic estimate of \$150 million relates to the implementation of billed party preference for InterLATA payphone traffic alone. See, NPRM at ¶ 25. The total annual revenue base of that traffic has been estimated to be slightly in excess of \$1.1 billion. See, U.S. v. Western Electric, 698 F.Supp. at 360. This relationship of payphone revenues to the cost of implementing billed party preference for payphones suggests that there will be substantial impact upon rates paid by end users of payphones. It cannot be assumed that these rate increases to the end user will be offset by a commensurate reduction in commissions paid by interexchange carriers to airports and other premises owners.

3) Service Enhancements. The implementation of billed party preference may have the effect of curtailing the ability of the

3/ As the NPRM points out, even under a billed party preference system, callers will be able to use access codes to place interstate calls, and in some cases may be required to do so.

equipment suppliers and telephone companies to offer service enhancements to payphone users; this in turn may limit the abilities of airports and interexchange carriers (IXCs) to provide these service enhancements to the travelling public. There are several aspects to this concern. First, as it is described, billed party preference would require that all 0+ (and perhaps 0-) InterLATA calls be sent first to the local exchange carrier's operator service switch ("OSS") and then to the appropriate IXC or other operator service provider (OSP). Because of the supervision of the OSS switch in the path of the call, it may be more difficult (if not impossible) for an IXC to offer service enhancements that are provided at its own switch.

Second, the Commission has itself raised the question of the impact that billed party preference might have on payphones in which call processing functions are performed within the payphone itself. Airports have been at the forefront in stimulating the development of new and innovative payphone terminal equipment. If, as a result of billed party preference, the "smart" payphones that airports have already installed are obsoleted, they will have to be removed -- at considerable cost and inconvenience to the travelling public. The incentive which premises owners now have to arrange for the installation of state-of-the-art equipment will be extinguished.

Third, there is a problem with respect to calls billed to users in foreign countries and to commercial credit cards. For

some "gateway" airports -- e.g., New York, Los Angeles, Miami, and O'Hare -- calls made by travellers from foreign countries represent a significant percentage of total call volume. In recent years, airport operators have undertaken major campaigns to make their airports as friendly and comfortable to foreign travellers as possible. These efforts have included such airport-imposed requirements as calling instructions on payphones in foreign languages as well as in English. To the extent that billed party preference hinders or defeats the ability of foreign travellers to use payphones at airports, that segment of the public will be disserved.

A similar problem exists with respect to the apparent inability of billed party preference to handle commercial credit cards. This limitation threatens to obsolete equipment that has been installed at some airports designed to handle these cards.^{4/} In any case, a system which does not apply to commercial credit card calls will make use of payphones disadvantageous for those members of the travelling public who do not wish to have (or elect not to use) a telephone company issued calling card.

* * *

On its face, billed party preference offers the convenience of avoiding the use of five-digit access codes at a price which appears to entail degradation in quality of service, increased costs to users of public payphones, and curtailment of service

^{4/} It may also impair air-to-ground telephone service.

enhancements and flexibility. If billed party preference were the only means by which travellers could reach the OSP or IXC of their choice, these disadvantages might have to be weighed in the balance. But that is not the case. As a result of unblocking, payphone users now can reach the interstate telephone carrier of their choice. It is our experience that the present system of delivering payphone service to the travelling public, although not without flaws, works reasonably well. Fundamental alteration to that system should not be made absent unequivocal proof that the public -- and the travelling public in particular -- will benefit from billed party preference.

Billed Party Preference Should Not Be Implemented
Until It Is Integrated Within a Regulatory Structure
That Assures Fair and Reasonable Compensation To All
Premises Owners.

The NPRM recites as an "apparent advantage" of billed party preference the fact that it would "focus competition" on the provision of operator services toward "end users." NPRM at ¶ 19. The advantage may be more apparent than real.

1. To the Extent that Billed Party Preference Denies Premises Owners the Opportunity to Recover Their Costs, the Availability and Convenience of Payphone Service May Decline. The NPRM itself calls for comment "on the impact billed party preference might have on competition in the provision of payphones." We believe that this focuses the question too narrowly. Whether or not the MFJ Court was correct in its conclusion that the premises owner is the "'subscriber' in the

public telephone context" the Court was certainly correct that, as a practical matter, the premises owner has "ultimate control" over the public telephones on its premises. U.S. v. Western Electric, 698 F.Supp. at 364-65. The proper question to be addressed, therefore, is what impact billed party preference will have upon the provisioning of payphone service by premises owners and, in turn, what are the "public interest ramifications" (NPRM at ¶ 28) of that impact upon the public.

In terms of airports, the answer to this question is simple and straightforward: to the extent that billed party preference denies airports the opportunity to recover the costs -- including the opportunity costs -- of making payphone services available to the travelling public, airports may have no alternative other than to curtail the number and the location of payphones. As a result, the availability and convenience of payphone services to the public may decline.

Airports cannot avoid the legal and economic imperative to take steps necessary to "make the airport as self-sustaining as possible." Appendix D, 14 C.F.R. Part 152, supra. If the revenues received by airports from telephone compensation commissions for interstate calls are eliminated as the result of billed party preference, interexchange carriers and operator service providers would be doing business at airports but not paying their fair share toward covering airport development and operating costs. Airports would have to take some action to ensure that other businesses or

tenants at the airport would not be burdened with these unrecovered costs.

In some cases, airports would convert their existing telephone company-supplied installations to private payphone operations; indeed, some airports have already exercised this option and others are looking at it.^{5/} More generally, airports would have the incentive to reduce the number of payphones installed at their facilities and replace those installations with other revenue producing concessions. Ironically, payphones which experience the heaviest usage -- those located in gate and common\ticket areas -- are also those most likely to be removed because these areas are most suitable to alternative business uses. Unless, therefore, billed party preference is integrated into a regulatory framework that assures adequate cost recovery to premises owners, it may have the unintended effect of degrading the availability and accessibility of payphone service to the public.

2. The Regulatory Impediments to a System of Fair Compensation to Premises Owners Must be Addressed in this Docket.

There are two fundamental impediments to the integration of billed party preference into a system that provides airports and other premises owners the opportunity to fairly and reasonably recover the cost of making available public payphones. Fortunately, both

^{5/} Although the now existing compensation mechanism for private payphones is seriously flawed (see discussion, infra. at p. 14, et. seq.), it, at least, assures that premises owners have some opportunity to recover some of the cost of providing payphone service.

are regulatory. They can and should be addressed by the Commission in this docket. The first has to do with the fact that, at present, compensation for non-presubscribed traffic is assured only in the case of competitive (non-telephone company supplied) payphones. The regulatory structure is thus incomplete. The second impediment arises because the existing payphone compensation mechanism is based upon a monthly fee. This measure wholly fails to adequately reflect the actual level of usage of payphones at major facilities such as airports. We discuss these problems in turn.

(a) The Scope of the Compensation Mechanism. In the pay telephone compensation proceeding, the Commission specifically denied requests to extend a compensation mechanism to aggregators other than competitive payphone owners. Second Report and Order in Docket 91-35 at ¶ 57. This decision was based upon the very narrow ground that the issue of compensation to premises owners other than private payphone owners was "beyond the scope" of that proceeding. Id. The Commission's unwillingness to enlarge the scope of the earlier proceeding was not entirely without justification: Congress imposed a very stringent timetable upon the Commission's completion of that proceeding.

That justification does not hold in the present proceeding. By the most optimistic assessments, billed party preference will not technologically be ready for deployment for three to five years. The time constraints which mandated that the earlier

proceedings be given an extremely narrow focus do not exist here.

Plainly, then, the question of premises owner compensation for telephone company supplied payphones can and should be addressed in the context of this proceeding. We do not, at this stage, set forth in detail our views as to the precise mechanism to be selected, except to note that there are at least two alternative solutions. First, the Commission has the inherent power under the Communications Act to establish compensation mechanisms for telephone company supplied payphones.^{6/} Secondly, there has long been pending before the Commission a petition filed by the Public Telephone Council seeking a declaratory ruling that telephone company pay telephones are customer premises equipment for regulatory purposes.^{7/} If the relief sought by the Public Telephone Council were to be granted, it would have the effect of placing telephone company supplied payphones on the same footing as private payphones for purposes of the Telephone Operator Consumer Services Improvement Act and payphone compensation. Other approaches may exist.

The proponents of billed party preference insist that this service must be made applicable, at the minimum, to private as well as telephone company supplied payphones. See, e.g., Bell Atlantic

6/ Comments of AACI-NA (formerly AOCl) in Docket No. 91-35 at 5-8 (filed April 12, 1991).

7/ See Expedited Petition for Declaratory Ruling, filed by the Public Telephone Council July 18, 1988; see also Petition to Expand the Scope of Rulemaking, filed by American Public Communications Council in CC Docket 92-77 on May 28, 1992.

Petition for Rulemaking at 6-7 (filed April 14, 1989). The corollary is equally true: unless billed party preference is integrated into a regulatory structure that assures premises owners compensation with respect to all types of payphones that may be on their premises, its implementation will be severely disruptive of the economics of payphone service and, in consequence, of the benefit of that service to the American public. The Commission should therefore issue a supplemental notice in this docket in which it specifically invites comments on the selection of the appropriate mechanism for assuring that premises owners are compensated for their role in making available telephone company as well as privately supplied payphones.

(b) Level of Compensation. The Commission's decision to establish a \$6.00 per month per payphone compensation rate for private payphone operators was based exclusively upon its conclusion that "it is not feasible to implement per call compensation at this time." Second Report and Order in Docket No. 91-35 at ¶ 13. The Commission explicitly recognized that a flat monthly fee is far from satisfactory and it directed the Common Carrier Bureau to continue to consult with the industry to explore whether and how a per call compensation mechanism might be implemented in the future.

We do not question the validity of the Commission's conclusion that it is not -- at present -- "feasible" to base payphone compensation on anything other than a flat fee. But, it is

absolutely essential that this conclusion be reexamined in the billed party preference context. This is because billed party preference fundamentally alters not just the way in which phone calls originated from payphones are routed, but also the technology used to handle such calls. Specifically, the claim that LECs cannot track completed payphone calls because they do not generally receive answer supervision for such calls does not hold up in the billed party preference environment. Under billed party preference, all calls subjected to this system are first connected to the local exchange carrier's OSS switch. Once that connection has been made, the local exchange carrier plainly will have the power to capture (and to provide to the IXCs) the number of interstate InterLATA calls originated at a particular payphone during a particular time interval, and the IXC surely knows the number of those calls that were completed. In short, billed party preference clearly carries with it the technological and operational imperative to measure payphone compensation on a per call basis. Indeed, it may permit compensation to be based (as it should) on the length of call.

In any case, if billed party preference is not to have adverse consequences upon availability of payphone service at public facilities a more accurate and fair measure of compensation is imperative. The Commission's \$6.00 per month flat fee is based upon estimates that the average private payphone is used to make 30 interstate calls per month. See, Second Report and Order in

Docket 91-35 at ¶ 34, n.59. However, payphones at airports -- and particularly those located in gate and common/ticket areas -- experience levels of usage that are 3 or more times greater than these estimates. The flat fee mechanism falls far short of accurately reflecting the value that airports provide to IXCs and OSPs in making payphone service available to the travelling public. Under a flat fee mechanism, the economic and legal standards requiring airports to maintain self-sufficiency will not be satisfied. Curtailment of the number of payphones could occur; and as these phones are replaced by businesses that yield compensation to airports which is more closely aligned with the costs, the availability and quality of payphone service will decline.

* * *

Accordingly, it is not possible to separate the broader interests of end users from the direct interests of airports and other premises owners. Unless billed party preference is integrated into a system that assures premises owners fair and adequate compensation for the central part that they play in the provision of this service, the availability and quality of service will diminish, to the detriment of the public. We urge, therefore, that this proceeding be enlarged to encompass the basic questions regarding the scope of payphone compensation and the level of compensation available to premises owners we have raised. The Commission should refrain from authorizing the implementation of

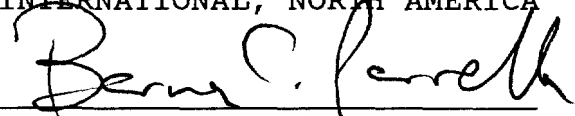
billed party preference until such time as these basic issues have been resolved.

Conclusion

For these reasons, AACI-NA urges that the Commission refrain from implementing a system of billed party preference unless and until the public benefits of this service are plainly established and a regulatory system assuring fair and reasonable compensation to premises owners has been put in place.

Respectfully submitted

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Boise Air Terminal Gowen Field	Fort Wayne-Allen County Airport Authority Fort Wayne International Airport
Massachusetts Port Authority	Tri-City International Airport Commission (Freeland)
Brownsville/South Padre Island International Airport	Gainesville-Alachua County Regional Airport Authority
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General Mitchell International Airport	Capital Region Airport Commission (Richmond)
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Muskegon County Airport	Lambert-St. Louis International Airport
Metropolitan Nashville Airport Authority	St. Petersburg-Clearwater International Airport
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	Airport Department